



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

RENEE CIPRIANO, DIRECTOR

(217)782-3397
(TDD: 782-9143)

October 3, 2001

CERTIFIED MAIL #7000 1670 0008 6137 4745

Rexnord Corporation
c/o C T Corporation System, Agent
208 South LaSalle Street
Chicago, Illinois 60604

Re: Request for Information to assist in the Downers Grove Groundwater Investigation

Dear Sirs:

I am writing to request your cooperation in providing information and documents to assist the Illinois Environmental Protection Agency ("Illinois EPA") in its investigation of the Downers Grove Groundwater Investigation Site ("Site"). The Site is located in the western portion of Downers Grove and adjacent portions of unincorporated DuPage County, Illinois. The general boundaries of the Site are the BNSF railroad tracks on the north, Main Street on the east, Interstate I-355 on the west, and 63rd Street on the south. This letter specifically seeks information relating to the Rexnord Corporation facility at 2400 Curtiss Street. For the purposes of this request, "you" means the Rexnord Corporation and "Facility" means all contiguous land and any building, structure, installation, equipment, pipe or pipeline, well, pit, pond, lagoon, impoundment, ditch, landfill, and storage container located at 2400 Curtiss Street.

I request pursuant to Section 4(b) and (h) of the Illinois Environmental Protection Act ("Act") (415 ILCS 5/4(b) and (h)) that you provide a complete and truthful response to this Information Request and attached questions (Attachment C) within 21 days of your receipt of this letter.

The Illinois EPA is investigating the potential sources and extent of releases of hazardous substances, pollutants, or contaminants at the Site. Illinois EPA is seeking to obtain information concerning the generation, storage, treatment, transportation, and methods used to dispose of such substances that have been, or threaten to be, released at or from the Site. Illinois EPA believes that you might have information, which may assist it in the investigation of the Site.

Some of the information Illinois EPA is requesting may be considered by you to be confidential or trade secret. If you wish to withhold any information from disclosure as confidential or trade secret information, you must make the appropriate claim, providing a clear and complete explanation of the basis for the claim, and specifically identify the information the information that you are withholding. The Illinois EPA, however, reserves the right to require submittal of the information if it determines that the information is pertinent to its investigation. In such event, you will be provided with the opportunity to assert a claim of exemption from public disclosure. Directions for asserting such claims are discussed further in Attachment A and D to this letter.

GEORGE H. RYAN, GOVERNOR

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If you have information about other parties who may have information which may assist the Illinois EPA in its investigation of the Site or may be responsible for the contamination at the Site, that information should be submitted within the time frame noted above.

Instructions for the response to the questions in Attachment C to this document are described in Attachment A. Your response to this Information Requests should be mailed to:

Joe Dombrowski
Remedial Project Management Section
Bureau of Land
Illinois Environmental Protection Agency
1021 N. Grand Avenue East, Box 19276
Springfield, Illinois 62794-9276

If you have additional questions about the Downers Grove Groundwater Investigation Site, please contact Carol Fuller at (217) 524-8807. However, if you have specific questions about the Information Request, please contact Mark Gurnik (217) 782-5544.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,



Renee Cipriano
Director

CC: Rexnord Corporation, 2400 Curtiss Street

Enclosures

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**Bcc: Joe Dombrowski, BOL
Mark V. Gurnik, DLC
Carol Fuller, BOL
Cliff Gould, Des Plaines BOL/FOS**

ATTACHMENT A

Information Request Instructions

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.
2. Number Each Answer. Precede each answer with the corresponding number of the question and the subpart to which it responds.
3. Provide the Best Information Available. Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to you will be considered non-compliance with this Information Request.
4. Identify Sources of Answer. For each question, identify (see Definitions in Attachment B) all the persons and documents that you relied on in producing your answer.
5. Confidential and Trade Secret Information. If you contend that the information requested herein includes confidential or trade secret information, and the Illinois EPA instructs you that the information requested must be provided, you may wish to assert a claim covering part or all of the information requested, pursuant to Sections 7 and 7.1 of the Environmental Protection Act (415 ILCS 5/7 and 7.1 (2000)) and 2 Ill. Adm. Code 1828.401. (See Attachment D) You must make a separate assertion of confidentiality for each response and each document that you consider confidential.
6. Disclosure to Illinois EPA Contractor. Information which you submit in response to this Information Request may be disclosed by Illinois EPA to authorized representatives of the State of Illinois, pursuant to applicable law, even if you assert that all or part of it is confidential or trade secret information. Please be advised that Illinois EPA may disclose all responses to this Information Request to one or more of its private contractors for the propose of organizing and/or analyzing the information contained in the responses to this Information Request.
7. Objection to Questions. If you have objections to some or all the questions within the Information Request letter, you are still required to respond to each of the questions.

ATTACHMENT B

Information Request Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term **"arrangement"** means every separate contract or other agreement between two or more persons, whether written or oral.
2. The term **"documents"** includes any written, recorded, computer-generated, or visually or aurally reproduced material of any kind in any medium in your possession, custody, or control, or known by you to exist, including originals, all prior drafts, and all non-identical copies.
3. The term **"hazardous substance"** shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other non-hazardous substances.
4. With respect to a natural person, the term **"identify"** means, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with title, position or business.
5. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term **"identify"** means to provide its full name, address, and affiliation with the individual and/or company to whom/which this request is addressed.
6. The term **"material"** or **"materials"** shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
7. The term **"person"** shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.
8. The term **"pollutant or contaminant"** shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations; except that the term "pollutant or contaminant" shall not include petroleum.
9. The term **"real estate"** shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

10. The term "release" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
11. The term "Site" shall mean the Downers Grove Groundwater Investigation site located in the western portion of Downers Grove and adjacent portions of unincorporated DuPage County, Illinois. The general boundaries of the Site are the BNSF railroad tracks on the north, Main Street on the east, Interstate I-355 on the west, and 63rd Street on the south.
11. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

ATTACHMENT C**Information Requests**

1. Identify all persons consulted in the preparation of the answers to these Information Requests.
2. Identify all documents consulted, examined, or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.
3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.
4. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal, or other handling of hazardous substances at the Facility by you, your contractors, or by prior owners and/operators.
5. Describe the nature of your activities or business at the Facility, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.
6. State the dates during which you owned, operated, or leased the Facility, and provide copies of all documents evidencing or relating to initiation of such ownership, operation, or lease arrangements (e.g., deeds, leases, etc.).
7. Provide information about the physical conditions at the Facility, including but not limited to the following:
 - a) Property boundaries, including a written legal description;
 - b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);
 - c) Surface structures (e.g., buildings, tanks, etc.);
 - d) Ground water wells, including drilling logs;
 - e) Storm water drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s), and other underground structures; and where, when and how such systems are emptied;
 - f) Any and all additions, demolitions, or changes of any kind on, under, or about the Facility, to its physical structures, or to the property itself (e.g., excavation work); and any planned additions, demolitions, or other changes to the Facility; and
 - g) All maps and drawings of the Facility in your possession.
8. Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) at the Facility. For each such solid waste management unit identified, provide the following information:

- a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;
 - b) The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;
 - c) The dates that the unit was in use;
 - d) The purpose and past usage (e.g., storage, spill containment, etc.);
 - e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit;
 - f) Pollutants, or contaminants, and damages resulting therefrom.
 - g) The construction (materials, composition), volume, size, dates of cleaning, and condition of each unit.
 - h) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.
9. Identify the prior owners of the Facility. For each prior owner, further identify:
- a) The dates of ownership;
 - b) All evidence showing that they controlled access to the Facility; and
 - c) All evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at the Facility during the period that they owned the Facility.
10. Identify the prior operators, including lessors, of the Facility. For each such operator, further identify:
- a) The dates of operation;
 - b) The nature of prior operations at the Facility;
 - c) All evidence that they controlled access to the Facility; and
 - d) All evidence that a hazardous substance, pollutant, or contaminant, was released or threatened to be released at or from the Facility and /or its solid waste units during the period that they were operating the Facility.
11. Provide copies of all local, state, and federal environmental permits ever granted for the Facility or any part thereof (e.g., RCRA permits, NPDES permits, etc.).
12. Provide all reports, information, or data related to soil, water (ground and surface), or air quality and geology/hydrogeology at and about the Facility. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.
13. After the time You acquired the Facility, is there evidence or reason to know that any hazardous substance, contaminants, pollutants or oil was disposed of on, at or adjacent to the Facility? Describe the basis of this knowledge. Describe all investigation of the Facility you undertook prior to acquiring the Facility and all of the facts on which you based the answer to this question.

14. Describe all leaks, spills or releases or threats of releases of any kind into the environment of any hazardous materials that have occurred or may occur at or from the Facility, including but not limited to:
- a) When such releases occurred or may occur;
 - b) How the release occurred or may occur;
 - c) What hazardous materials were released or may be released;
 - d) What amount of each such hazardous material was so released;
 - e) Where such releases occurred or may occur;
 - f) Any and all activities undertaken in response to each such release or threatened release;
 - g) Any and all investigations of the circumstances, nature, extent or location of each such release or threatened release, including the results of any soil, water (ground and surface), or air testing that was undertaken; and
 - h) All persons with information relating to subparts a through g of this question.
15. If the answer to question 14 is anything but an unqualified "no," and if any releases or threatened release identified in response to question 14 above occurred into any subsurface disposal system or floor drain inside or under your building or buildings at the Facility, identify:
- a) Where the disposal system or floor drains were located;
 - b) When the disposal system or floor drains were installed;
 - c) Whether the disposal system or floor drains were connected to pipes;
 - d) Where such pipes were located and emptied;
 - e) When such pipes were installed;
 - f) How and when such pipes were replaced, or repaired; and
 - g) Whether such pipes ever leaked or in any way released hazardous materials into the environment.
16. Did any leaks, spills, or releases of hazardous materials occur at the Facility when such materials were being:
- a) Delivered by vendor;
 - b) Stored (e.g., in any tanks, drums, or barrels);
 - c) Transported or transferred (e.g., to or from any tanks, drums, barrels, or recovery units); or
 - d) Treated.
17. If the answer to the preceding question is anything other than an unqualified "no", provide all documents relating to any such leaks, spills or releases.
18. Has soil ever been excavated or removed from the Facility?
- a) Amount of soil excavated;
 - b) Location of excavation;
 - c) Manner and place of disposal and/or storage of excavated soil;
 - d) Dates of soil excavation;
 - e) Identity of persons who excavated or removed the soil;
 - f) Reason for soil excavation;

- g) Whether the excavation or removed soil contained hazardous materials and why the soil contained such materials;
 - h) All analyses or tests and results of analyses of the soil that was removed from the Facility;
 - i) All persons, including contractors, with information about (a) through (h) of this request;
 - j) All reports, summaries or other documentation describing the excavation.
19. Provide records from 1972 through the present showing how much chlorinated solvent/cleaner or other chlorinated materials were purchased for the Facility. Provide records from 1972 through the present, which show how much chlorinated solvent/cleaner or other chlorinated materials were sent from the Facility to be recycled or disposed. Provide the manifests showing such recycling or disposal.
20. Provide all records regarding the disposal of solid waste from the Facility from 1972 to present.

ATTACHMENT D

2 Ill. Adm. Code 1828.401

Section 1828.401 Claims By Submitters That Public Records Are Exempt From Disclosure.

- a) A claim that a public record is exempt from public disclosure pursuant to Section 1828.202 must be made at the time of submittal of the public record.
- b) A claim that a public record is exempt from public disclosure must include:
 - 1) A claim letter, stating that the public record is exempt from public disclosure pursuant to Section 1828.202, identifying all exemptions that apply, and briefly describing the public record;
 - 2) A justification for the claim, including:
 - A) If the public record is a subsequent version of a public record previously granted exempt status by the Agency, a certified statement indicating:
 - i) The date of submission of the previous public record; and
 - ii) That the previous justification remains applicable to the current submission; or
 - B) If the submittal is not a subsequent version of a public record previously granted exempt status by the Agency, the following information:
 - i) Measures taken by the submitter to prevent disclosure of the public record;
 - ii) The rights of privacy, if any, that might be invaded by disclosure of the public record;
 - iii) The competitive value, if any, of the public record to the submitter; and
 - iv) Any other information that will support the claim for exemption from disclosure;
 - 3) A copy of the public record, marked in accordance with the requirements of subsection (c) of this Section; and
 - 4) If the submitter is currently a party in a proceeding before the Board or a court in which the information is relevant to the issues, the title of the proceeding, docket number, and, if applicable, identification of the court.
- c) The submitter must mark a public record or portions thereof claimed exempt from disclosure as follows:

- 1) Where the public record is claimed to be exempt from disclosure in its entirety, mark the public record with the words "Public Record Claimed Exempt" in red ink on the face or front of the public record. If submitted in electronic format, the public record must be clearly marked in bold at the top or front of the public record with the words "Public Record Claimed Exempt"; or
- 2) Where less than the entire public record is claimed to be exempt from disclosure:
 - A) Mark the public record with the words "Public Record Claimed Exempt – In Part" in red ink on the face or front of the public record. If submitted in electronic format, the public record must be clearly marked in bold at the top or front of the public record with the words "Public Record Claimed Exempt – In Part";
 - B) Indicate on the face or beginning of the public record which portion of the public record is claimed to be exempt from disclosure;
 - C) Mark every portion of the public record which is claimed to be exempt from disclosure with the words "Public Record Claimed Exempt"; and
 - D) Furnish the Agency with a second copy of the public record that is marked in accordance with (A) and (B) of this subsection and from which the portion of the public record that is claimed to be exempt from disclosure is deleted.

- 1) The Morey Corporation - *IL voluntary program 1/1/97 established?*
- 2) CPV Systems, Inc
- 3) Tricon Industries Incorporated
- 4) Arrow Gear Company
- 5) Scot Incorporated
- 6) Autonation USA Corporation
- 7) Contemporary Control Systems, Inc.
- 8) C & C Machine Tool Service, Inc.
- 9) Downers Grove Sanitary District
- 10) Bales Mold Service Inc.
- 11) Ames Supply Company
- 12) Maple Plaza Cleaners, 2265 West Maple Ave. - *dry cleaners*
- 13) Universal Fire Protection, LTD
- 14) Rexnord Corporation - *A*
- 15) Flexible Steel Lacing Company
- 16) Ketone Automotive, Inc., 4935 Belmont Road
- 17) Magnetrol International Incorporated
- 18) Dynagear, Inc.
- 19) Econotemp, Inc.
- 20) Grove Automotive LTD, 5103 Belmont Road
- 21) Hahn Graphics